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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Telephone Number Portability	)	CC Docket No. 95-116
	)	
Petition for Extension of Implementation of the Cellular Deadlines Telecommunications Industry Association	)	DA 97-2579

TO: CHIEF, WIRELESS TELECOMMUNICATIONS BUREAU

COMMENTS OF GTE SERVICE CORPORATION

GTE Service Corporation and its telephone and wireless subsidiaries ("GTE") hereby submit their comments in support of the above-referenced Petition filed by the Cellular Telecommunications Industry Association ("CTIA") on November 24, 1997.[1] In the Petition, CTIA asks the Federal Communications Commission ("FCC" or "Commission") to extend the deadline for commercial mobile radio services ("CMRS") providers to implement service provider number portability by nine months to March 31, 2000. CTIA argues that although CMRS providers are diligently working to solve the unique technical and operational difficulties associated with implementing CMRS number portability, the extension is necessary because CMRS providers will not be able to resolve these issues in time to meet the current June 30, 1999 deadline.

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[1] Telephone Number Portability, Petition for Extension of Implementation Deadlines of the Cellular Telecommunications Industry Association, CC Docket No. 95-116, filed November 24, 1997 (hereinafter "Petition").

GTE supports the CTIA Petition. CMRS providers are faced with technical and operational issues in implementing service provider portability that are unique to the wireless industry. Although the industry continues to work to resolve these issues, it is clear that the wireless industry cannot resolve these issues and deploy CMRS number portability by the June 30, 1999 deadline.[2] GTE therefore agrees with CTIA that a nine-month extension is necessary to enable the wireless industry to address these technical and operational issues and "to ensure efficient development of number portability."[3]

I. Discussion

A. The Wireless Industry Is Working to Resolve Technical Issues to Ensure Efficient Development of Number Portability

The wireless industry has identified a number of technical and operational issues that are clear obstacles to provisioning number portability. Today, service providers use a single number both for identifying subscribers and as directory numbers. Thus, generally, the Mobile Identification Number (MIN) is also used as the Mobile Directory Number (MDN). Currently in North America, registration, call processing, provisioning, customer care and billing only require one ten-digit number, the MIN.

In order to support service provider portability and minimize the impact on the existing wireless network infrastructure, the wireless industry has determined that it is

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2 Telephone Number Portability, *First Memorandum Opinion and Order on Reconsideration*, CC Docket No. 95-116, 12 FCC Rcd 7236 (¶ 134) (1997) (hereinafter "*Reconsideration Order*").

3 *See* Telephone Number Portability, *First Report and Order and Further Notice of Proposed Rulemaking*, CC Docket No. 95-116, 11 FCC Rcd 8352 (¶ 167) (1996) (hereinafter "*First Report and Order*").

necessary to separate the MIN from the MDN. Once separated, the MDN will be the dialable number, while the MIN will remain in the mobile phone as a ten-digit, non-dialable number associated with a specific service provider. When a subscriber changes service providers, the MDN will be ported with the subscriber and a new MIN will be assigned by the new service provider.[4]

The separation of the MIN and MDN will significantly affect how the wireless industry processes calls. As CTIA notes, the wireless industry has reached a consensus on the split MIN/MDN architecture and is currently working to develop the necessary standards and protocols to be used by all wireless carriers in implementing that architecture.[5] The standards and protocol development process, however, is not complete. These processes are complicated by the fact that the MIN today is used by wireless networks to perform a number of functions.[6]

For example, the E911 callback feature will require serving systems to support the MIN and MDN separation. Emergency services providers must receive the MDN to call back a wireless 911 caller that becomes disconnected. If a serving system is not capable of supporting the MIN and MDN separation, however, the callback feature will fail when using the MIN to call back a ported subscriber. Thus, if only the MIN is

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4 The subscriber's mobile phone will need to be reprogrammed with the new MIN.

5 Petition at 6-7.

6 *Id.*

provided, the call-back attempt will likely result in the wrong subscriber being contacted.[7]

Likewise, nationwide roaming requires all serving systems to support the MIN and MDN separation. Today, the MIN is used to identify the subscriber, to identify the subscriber's home market, and to communicate with the subscriber's carrier for validation and fraud prevention purposes. Once the MIN and MDN are separated, however, wireless systems must be capable of using the MDN to identify the subscriber and the MIN to identify and communicate with the subscriber's carrier.[8] Without this capability, automatic roaming will not work properly in all areas.

Separating the MIN and MDN will also impact network elements (i.e., Mobile Switching Center (MSC), Home Location Register (HLR), Visitor Location Register (VLR), Signaling Transfer Point (STP), etc.) and back office systems. Network elements will need to have the capability to support both the MIN and MDN parameters. Customer care will need to be modified to support customer inquiries, regardless of

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[7] This is because the MIN of the E911 caller may be the MDN of a different subscriber.

[8] *See* Petition at 6-7.

whether the care center is provided with a MIN or MDN.[9] In addition, billing systems must be redesigned to ensure proper billing.[10]

B. Extending the Implementation Date to March 31, 2000 Is Appropriate

When the FCC ordered CMRS providers to provide number portability, it recognized that the wireless industry might encounter technical and operational difficulties in provisioning number portability. Accordingly, the FCC expressly delegated to the Wireless Telecommunications Bureau Chief the authority to stay or waive, to the extent necessary to ensure the efficient development of number portability, the June 30, 1999 implementation date for a period not to exceed nine months.[11]

Wireless industry groups have been working diligently to develop an effective number portability infrastructure.[12] Despite these efforts, due to the complexity in provisioning number portability, CMRS providers will not be able to meet the June 30, 1999 deadline. For example, TR-45.2 recently modified their workplan to limit the

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9 Many older analog cellular phones display their MIN but have no ability to display or recognize their own directory number. This means that after a subscriber ports his or her number, the newly assigned MIN that is displayed might actually be another subscriber's phone number. Customer education will be needed to alleviate confusion and frustration.

10 This list represents only those functions that will be affected by the MIN/MDN split that have been identified to date. There may be future areas of concern as the industry continues to explore the technical and operational issues posed by CMRS number portability.

11 *First Report and Order* at ¶ 167.

12 GTE is an active participant of CTIA's Number Portability Sub Task Group, CTIA Subject Matter Expert (SME) workshops, CTIA Number Advisory Group (NAG), TR-45.2 (Wireless Intersystem Technology), and North American Numbering

scope of the second phase standard document to include only functionalities needed for service provider portability.[13] TR-45.2 hopes to put this standard document to a vote in May, 1998. Historically, at best, it takes 18-24 months for vendors to implement a standardized capability. As such, the capabilities for service provider portability support will be standardized no sooner than May 1998 and vendor equipment will not be available for CMRS providers to deploy number portability until November 1999, at the earliest.

GTE believes that an additional nine months is necessary to better enable wireless carriers to implement service provider portability. As discussed above, the additional nine months will give the wireless industry an opportunity to resolve technical issues. In addition, the requested extension will better enable wireless carriers to implement service provider portability without degrading services such as nationwide roaming, E911 callback, and proper billing and customer care that are vital to the public interest. For these reasons, GTE urges the Wireless Telecommunications Bureau Chief to grant the CTIA Petition.

Council Wireline Wireless Integration Task Force to assist the industry in resolving number portability issues.

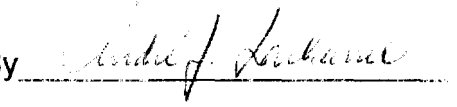
[13] TR-45.2 recently modified the first phase standard document for a 30-day re-ballot in February 1998. The scope of the re-ballot text is strictly limited to the functionality needed to support the first phase (i.e., NP query/response capability) of wireless number portability. The reballoting and the scope limitation are a result of the complexity encountered during development. Additional materials (e.g., SMS support and ACG) are deferred for a third phase of standardization, scheduled for a November 1998 ballot.

II. CONCLUSION

GTE supports the CTIA petition to extend the deadline for wireless carriers to implement service portability by nine months. GTE believes the additional time is necessary to enable the wireless industry to resolve the technical and operational issues that arise in implementing number portability. Furthermore, the added time will better ensure that implementation of number portability does not interfere with the operation of important services such as nationwide roaming, E911, and customer service.

Respectfully submitted,

GTE Service Corporation and its domestic telephone and wireless companies

By 

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January 9, 1998

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Certificate of Service

I, Judy R. Quinlan, hereby certify that copies of the foregoing "Comments of GTE Service Corporation" have been mailed by first class United States mail, postage prepaid, on January 9, 1998 to the party listed below:

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